



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 05 2007

REPLY TO THE ATTENTION OF

R19-J

Honorable Carl Levin
United States Senate
Washington, DC 20510-2202

US EPA RECORDS CENTER REGION 5



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Dear Senator Levin:

Thank you for your March 23, 2007 letter regarding the planned Time-Critical Removal Action (TCRA) at the former Plainwell Impoundment in the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This action includes the removal of approximately 132,000 cubic yards of PCB-contaminated paper residuals, sediments and soils ("materials") from the Kalamazoo River and placement of the materials into the Allied Paper Landfill ("Landfill") located in Kalamazoo. The Landfill is one of four on-site landfills that are part of the site. In your letter, you specifically requested a response to several community concerns related to the TCRA. The response to these questions can be found in the enclosure to this letter.

By way of background, the Landfill has existed for more than 50 years and contains approximately 1 million cubic yards of PCB-contaminated materials generated by the paper recycling operations at the former Allied Paper mills located in Kalamazoo. The Landfill is divided into several areas. In 1966, one area of the Landfill was originally licensed as a landfill to receive non-process waste. In 1978, this area was licensed as a Type II Landfill and later designated as a Type III Landfill to receive paper residuals and demolition wastes. The Type III landfill is no longer permitted by the state and no longer receives industrial or paper residual material. The other areas within the Landfill were used in the 1950's as dewatering lagoons for process paper residual waste generated by the former Allied Paper mills. These lagoons or disposal areas were not permitted because the disposal of PCB-contaminated residuals occurred prior to the promulgation of the Toxic Substances Control Act (TSCA) regulations. Today, under TSCA regulations, the Superfund program must consult with the TSCA program prior to on-site disposal of PCB-containing material in concentrations greater than or equal to 50 ppm PCB.

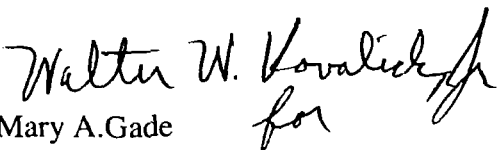
In 1999, the Superfund program conducted a TCRA at the Bryant Mill Pond which is adjacent to the Allied Paper mill. The TCRA included the removal of approximately 150,000 cubic yards of PCB-contaminated materials and placement of the materials at the Landfill in an area called the FRDL#3. The paper residuals within the FRDL#3 were tested and the permeability calculated. Based on this information, the Superfund program

consulted with the TSCA program. The TSCA and Superfund programs agreed that the placement of the Bryant Mill Pond residuals did not present an unreasonable risk of injury to health or the environment.

We are sensitive to the community's concerns regarding the placement of the Plainwell Impoundment materials into the Landfill. My staff will continue to work with the City of Kalamazoo and the neighborhoods surrounding the Landfill to ensure that all parties are presented with factual information, and that issues which arise during the TCRA are addressed quickly.

Again, thank you for your letter. If you have any further questions, please contact me or your staff may contact Mary Canavan or Phil Hoffman, the Region 5 Congressional Liaisons at (312) 886-3000.

Sincerely,


Mary A. Gade *for*
Regional Administrator

Enclosure

cc: Honorable Hannah McKinney, Mayor, City of Kalamazoo
Steven Chester, Director, MDEQ
Jim Sygo, MDEQ
Andy Hogarth, MDEQ
Daria Devantier, MDEQ
Paul Bucholtz, MDEQ

bcc: Mary Canavan, ORA
Richard Karl, SFD
Wendy Carney, SFD
Sam Borries, SFD ✓
Eileen Furey, ORC
Jacqueline Clark, ORC

Enclosure

As requested in your March 23, 2007 letter, the United States Environmental Protection Agency (U. S. EPA) responses to the specific concerns raised by the community are provided below.

What measures will EPA take to contain the PCBs within the landfill and to prevent the PCBs from migrating to the city's water supply?

U.S. EPA has allowed the placement of the Plainwell Impoundment materials at the Landfill because site conditions indicate that the addition of these materials will not substantially modify conditions at the Landfill. U.S. EPA believes that the materials will be managed safely at the Landfill.

As a part of the current TCRA, the Plainwell Impoundment material will be placed on top of the existing paper residuals at the Western Disposal Area within the Landfill. Placement of the Plainwell Impoundment materials in this area is not harmful because:

- The area where the Plainwell Impoundment material will be disposed is outside the 100 year floodplain.
- The Plainwell Impoundment materials will be placed on top of existing paper residuals. The paper residuals, which are made of very dense clay and fiber, are up to 20 feet deep within the Western Disposal Area and were originally from FRDL#3. The permeability of the paper residuals was calculated to be 2.94×10^{-7} to 3.82×10^{-8} centimeter/second, which means water moves very, very slowly through this material.
- Since the time of the permeability tests, paper residuals in the Western Disposal Area are likely to have remained impermeable because the residuals have compacted over time.

As a part of the TCRA, water resulting from settlement of the Plainwell Impoundment materials and storm water that may collect in the area where the Plainwell Impoundment materials are placed will be collected in temporary sediment basins. The collected water will be treated with carbon prior to discharging to the City of Kalamazoo's waste water treatment plant.

A temporary cover, consisting of one foot of soil with vegetation, will be placed over the Plainwell Impoundment materials at the completion of the TCRA. This cover will prevent any erosion of or direct contact with any of the materials from the Plainwell Impoundment until a final cleanup decision is made. A final cleanup decision will be made for the Landfill after U.S. EPA approves the Remedial Investigation and completes Feasibility Study (RI/FS) for the Landfill and a Proposed Plan is made available for public comment.

In addition, groundwater monitoring has been occurring at the Landfill for a number of years. A key objective of the monitoring program has been to gather information on groundwater flow direction and the quality of the groundwater. There are 103 sample points (which are measured monthly) used for determining groundwater flow directions and 57 monitoring wells for evaluating groundwater quality at the site.

There is no reason to believe there is any threat of contamination to the City of Kalamazoo's drinking water supply wells from the Allied Paper Landfill. Based on all available data, groundwater does not travel toward the City of Kalamazoo's drinking water supply wells. Instead, all of the groundwater flow information gathered to date indicates that groundwater underneath the Landfill travels toward and discharges to Portage Creek.

The majority of the Landfill has a groundwater collection system along Portage Creek in front of a sheet pile wall. Groundwater that is collected by this system is treated with carbon prior to discharging to the City of Kalamazoo's waste water treatment plant. No PCBs have been detected coming out of the groundwater capture zone and no PCBs have been detected after carbon treatment prior to discharging to the City of Kalamazoo's waste water treatment plant.

What monitoring system will EPA use to ensure that the contaminants are not migrating from the landfill, and to ensure that the city's water supply is safe?

As indicated above, extensive groundwater monitoring has already occurred at the Landfill. Based on all available data, groundwater does not travel toward the City of Kalamazoo's drinking water supply wells. However, U.S. EPA is committed to ensuring adequate groundwater monitoring will be conducted at the Landfill long-term to ensure groundwater conditions do not change.

U.S. EPA is also committed to ensuring that adequate maintenance of the temporary cover is conducted to prevent any erosion or direct contact with the Plainwell Impoundment materials until a final cleanup decision is made for the Landfill.

Is the disposal of contaminants at the Allied Paper Landfill a temporary measure, and if so, how many months/years will the sediments remain in the landfill and what are the plans for the Bryant Mill Pond residuals that were also disposed of at the Allied Paper Landfill?

Placement of the Plainwell Impoundment material under the TCRA is considered temporary only in the legal sense that it is not a final cleanup decision. A final cleanup decision for the Landfill will be made in a Record of Decision after the RI/FS is finalized and U.S. EPA's Proposed Plan is made available for public comment. U.S. EPA anticipates completing the RI/FS and making a final cleanup decision for the Landfill within the next 18 to 24 months.

In evaluating final cleanup alternatives for the Landfill, U.S. EPA and the Michigan Department of Environmental Quality (MDEQ) will consider an alternative that allows for the Plainwell materials, along with the materials already at the Landfill (which include the Bryant Mill Pond TCRA materials and the one million cubic yards of material placed in the Landfill during the 50s, 60s, and 70s) to remain in place. U.S. EPA and MDEQ have already made final cleanup decisions for the other three landfills at the site: King Highway Landfill, 12th Street Landfill and Willow Blvd/A-site Landfill. The final cleanup decisions for all three landfills, which are also located adjacent to the Kalamazoo River and have similar materials as the Allied Paper Landfill, were to contain the materials at the landfills in place. The decision documents along with the Administrative Records for these landfills are publicly available and can be informative on how U.S. EPA's remedy selection criteria are evaluated for sites like the Allied Paper Landfill.

What is EPA's timeframe for the additional cleanup of the rest of the river sections?

U.S. EPA cannot predict when cleanup of the downstream reaches of the river will occur until the Supplemental Remedial Investigation/Feasibility Study (SRI/FS) for the river is completed. However, in accordance with the signed SRI/FS Administrative Order on Consent (AOC), U.S. EPA will develop SRI/FS project start dates for the downstream reaches of the River no later than 18 months from the signing of the AOC. The SRI/FS AOC was signed by U.S. EPA and the PRPs in February, 2007. As such, the SRI/FS project start dates for the downstream reaches will be developed no later than August, 2008. U.S. EPA will make every effort to develop realistic project start dates.

CARL LEVIN
MICHIGAN

United States Senate

WASHINGTON, DC 20510-2202

March 23, 2007

Ms. Mary Gade
Regional Administrator
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Administrator Gade:

I am writing concerning EPA's recent decision regarding the removal action at the Kalamazoo River Superfund site. Specifically, I am concerned about the removal action at the Plainwell Impoundment. This action, which is anticipated to begin as early as this April, involves the removal of about 132,000 cubic yards of sediment, containing 4,400 pounds of PCBs, which is planned to be disposed of at the Allied Paper Landfill in Kalamazoo, Michigan.

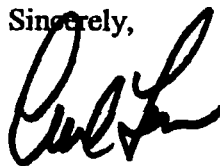
Although I certainly want to see the contaminants removed from the Kalamazoo River, I have some concerns about the EPA's disposal plan. My understanding is that the PCB-contaminated sediments have concentrations of 200 parts per million (ppm), and the site where the sediments are to be disposed of, the Allied Paper Landfill, is not permitted by federal regulation to handle wastes with this concentration of PCBs.

I am specifically asking the EPA to respond to the community's concerns regarding the disposal of the contaminated sediments.

- What measures will EPA take to contain the PCBs within the landfill and to prevent the PCBs from migrating to the city's water supply?
- What monitoring system will EPA use to ensure that the contaminants are not migrating from the landfill, and to ensure that the city's water supply is safe?
- Is the disposal of contaminants at the Allied Paper Landfill a temporary measure, and if so, how many months/years will the sediments remain in the landfill? In 1999, contaminated waste from the Bryant Mill Pond was also "temporarily" disposed of at the Allied Paper Landfill site; however, this waste still remains in the landfill today. What are the plans for that?
- What is EPA's timeframe for the additional cleanup of the rest of the river sections?

I look forward to hearing from you regarding this matter, and learning what steps you will take to ensure an environmentally responsible course of action is taken to address the Kalamazoo River contamination. The people of Kalamazoo deserve full protection of their health and welfare. Thank you for your attention to this serious situation. You may contact me or my staff, David Casey (Grand Rapids office, 616-456-2531) or Alice Yates (Washington, DC office, 202-224-2683) regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Levin', written over the word 'Sincerely,'.

Carl Levin